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7  
8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA, ) No. CR-07-00772-JF  
11 )  
Plaintiff, )  
12 ) **STIPULATION TO CONTINUE**  
vs. ) **STATUS HEARING; [PROPOSED]**  
13 ) **ORDER**  
DANIEL THOMAS REYES, )  
14 )  
Defendant. )  
15 \_\_\_\_\_)

16 Defendant and the government, through their respective counsel, hereby stipulate that,  
17 subject to the court's approval, the status hearing date in the above-captioned matter, presently  
18 scheduled for Wednesday, June 25, 2008 at 9:00 a.m., be continued to Wednesday, July 30, 2008  
19 at 9:00 a.m. The reasons for the request are that the parties have come to an agreement in  
20 principle to a resolution in the matter. The defense needs to submit to the prosecution some  
21 language for the final plea agreement and that in turn needs to be approved by the United States  
22 Attorney's office. The defense has not yet provided the requested language but expects to do so  
23 within the week.

24 The parties further agree and stipulate that time should be excluded from and including  
25 June 25, 2008 through and including July 30, 2008 for effective preparation of defense counsel,  
26

1 pursuant to Speedy Trial Act, 18 U.S.C. §3161(h)(8)(A) and (B)(iv). Accordingly, the United  
2 States and the defendant agree that granting the requested exclusion of time will serve the interest  
3 of justice and outweigh the interest of the public and defendant in a speedy trial.

4 Dated: June 24, 2008

/s/  
NICHOLAS P. HUMY  
Assistant Federal Public Defender

6 Dated: June 24, 2008

/s/  
JOHN GLANG  
Assistant United States Attorney

10 **ORDER**

12 GOOD CAUSE APPEARING, IT IS HEREBY ORDERED that the hearing date  
13 presently set for Wednesday, June 24, 2008 will be continued to July 30, 2008 at 9:00a.m.

14 IT IS FURTHER ORDERED, that the time between June 24, 2008 through and  
15 including July 30, 2008, shall be excluded for effective preparation of defense counsel, pursuant  
16 to Speedy Trial Act, 18 U.S.C. §3161(h)(8)(A) and (B)(iv).

17 IT IS SO ORDERED.

19 Dated: \_\_\_\_\_, 2008

\_\_\_\_\_  
JEREMY FOGEL  
United States District Judge